

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Part 97 of the Commission's ) RM-10413  
Amateur Service Rules Governing )  
Operating Privileges )  
 )

**COMMENTS OF MICHAEL BUCKLAEW, KA2KQP**

**I would like to comment on each point of the proposal as follows:**

In regards to the “re-farming” of the Novice sub-bands to allow increased voice allocations I **DISAGREE** with the proposal as written. I believe that some sub-band adjustments are necessary but should be done based on a complete review of current needs as well as future trends. If it is the Commission’s intention to continue with some type of incentive license structure for the amateur service then why remove one of the biggest incentives there is? (Additional privileges on expanded frequencies) As the Novice and Advanced class licensee base shrinks to some critical size, it will not make sense to have allocations for them. I don’t believe that it was ever the intention for amateur operators in the US to achieve one of the entry levels of license and then remain there for the duration of their ham radio career. It should be the goal of every amateur to achieve Amateur Extra. This was not to be a caste system but more of an apprenticeship program which allowed licensees the ability to grow and learn in the hobby, therefore justifying the free access to valuable RF spectrum.

It is my opinion that there should be as little regulation as possible with regard to the “dividing line” between narrow and wide band emissions. Before this can be successful, there must be a way to enforce “voluntary band-plans.” Unfortunately there will always be someone who will do as they please because they feel it is their right rather than understand their responsibility to be a considerate operator. Once this is accomplished, then we as amateurs would be able to adjust our bands on an “as-needed” basis to make more efficient use of our allocations. While I personally would like to see the 40 meter band have an Extra class voice allocation from 7075 to 7100 kHz, I believe that the ARRL proposal doesn’t address the long term needs of the US amateur radio service and therefore you should not grant their request.

In regards to the rules modification to allow spread spectrum in the 222 MHz band I find that I do not have enough information to determine the impact on non spread spectrum users versus the potential advantages to allowing such operation so I have **NO OPINION**.

In regards to the rules clarification to allow MCW emissions for identification I find that this would be helpful and so I **AGREE**.

In regards to the modification allowing the expansion of special event callsigns I believe that since the Commission has eliminated the requirement for an amateur to have a callsign reflecting his or her district, and the lack of such a restriction in this proposal, I find that there would be nothing to prevent someone from requesting a special event callsign from this expanded block for use in an area not associated with that callsign. The example cited by ARRL was the Kingman Reef operation which used the special event callsign of K5K. I don't believe that there was anyone who didn't know that the operation was not being conducted in the fifth call district area. The 2X1 format also corresponds to standard issue callsigns and may not be obvious as special events. Since these callsign areas are having less and less meaning every day as people move and retain their callsigns or apply for a vanity callsign for an area other than where they are located, I find that this proposal doesn't make sense and **I DISAGREE**.

In regards to the rules clarification for operations in the 33 cm band, I believe that this would be helpful with very little opportunity for harmful interference and so **I AGREE**.

Respectfully submitted by,

Michael J Bucklaew  
Amateur Radio Operator KA2KQP